

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

ANN BAKER PEPE,  
individually and on behalf of all others  
similarly situated,  
  
Plaintiff,  
  
v.  
  
GENZYME CORPORATION and  
LABORATORY CORPORATION OF  
AMERICA HOLDINGS  
  
Defendants.

Case No.: 1:12-cv-11110-DJC

**PLAINTIFF'S MOTION FOR AN AWARD OF FEES AND COSTS**  
**AND FOR AN INCENTIVE AWARD**

Plaintiff Ann Baker Pepe ("Plaintiff"), on behalf of herself and all others similarly situated, by and through her counsel, respectfully submits this Motion for an Award of Fees and Costs and for an Incentive Award. In support of this Motion, Plaintiff relies on (1) her Memorandum of Law in Support of Plaintiff's Motion for an Award of Fees and Costs and for an Incentive Award, and (2) the Declaration of Patrick J. Sheehan in Support of Plaintiff's Motions for Final Approval of Class-Action Settlement and for an Award of Fees and Costs and for an Incentive Award, filed concurrently herewith, as well as the pleadings, legal authorities, facts and other information cited or referred to therein.

WHEREFORE, Plaintiff respectfully requests this Court to grant this Motion for an Award of Fees and Costs and for an Incentive Award and enter a Final Order, Decree and Judgment, in the form attached as Exhibit A, to Plaintiff's Motion for Final Approval of Class Action Settlement.

Dated this the 9th day of December, 2014.

Respectfully submitted,

ANN BAKER PEPE,  
By her Attorneys,

WHATLEY KALLAS, LLP

/s/ Patrick J. Sheehan

---

Patrick J. Sheehan (BBO # 639320)  
psheehan@whatleykallas.com  
WHATLEY KALLAS, LLP  
60 State Street, 7th Floor  
Boston, MA 02109  
Tel: (617) 573-5118

Edith M. Kallas  
ekallas@whatleykallas.com  
Ilze C. Thielmann  
ithielmann@whatleykallas.com  
WHATLEY KALLAS, LLP  
1180 Avenue of the Americas, 20th Floor  
New York, NY 10036  
Tel: (212) 447-7060

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing document filed through the ECF system, will be served electronically through the ECF System on the email-registered participants as identified on the Notice of Electronic Filing ("NEF") on December 9, 2014.

/s/ Patrick J. Sheehan

Patrick J. Sheehan